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Lead Counsel for Direct Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 07-5944-SC

MDL No. 1917

This Document Relates To:

Crago, d/b/a Dash Computers, Inc., et al. v.
Mitsubishi Electric Corporation, et al., Case
No. 14-CV-2058 (SC).

**DECLARATION OF R. ALEXANDER
SAVERI IN SUPPORT OF REPLY BRIEF
IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS' MOTION TO
DISSEMINATE NOTICE OF DIRECT
PURCHASER CLASS CERTIFICATION**

Date: September 11, 2015

Time: 10:00 a.m.

Judge: Honorable Samuel Conti

Ctrm: 1, 17th floor

1 I, R. Alexander Saveri, declare:

2 1. I am the managing partner of Saveri & Saveri, Inc., which the Court has appointed as
3 lead counsel on behalf of the Direct Purchaser Plaintiffs (“DPPs”) in this action. I have been
4 involved in almost every aspect of this case since its inception. I submit this declaration in support
5 of the Reply Brief in Support of Motion to Disseminate Notice of Direct Purchaser Class
6 Certification. Except as otherwise noted, I make this declaration of my own personal knowledge,
7 and if called upon to do so, could and would testify competently to the facts contained herein.

8 2. Once class membership has been determined, DPPs’ expert can determine class
9 purchases and the overcharge thereon.

10 3. DPPs’ expert report would follow after the 45-day deadline for class members to opt
11 out.

12 4. On information and belief, it takes approximately ten to fifteen business days, or two
13 to three weeks, to prepare and disseminate notice.

14 5. DPPs believe that the prospect of trial will be the primary driver of settlement
15 negotiations.

16 6. The notice program is the same as the notice program approved by the Court with
17 regard to the settlement with Thomson.¹ The cost of the Thomson notice to the Direct Purchaser
18 Class was approximately \$50,000.

19 7. DPPs believe that advancing the case and avoiding delay will be worth significantly
20 more to the class than the small cost of notice.

21 I declare under penalty of perjury under the laws of the United States that the foregoing is
22 true and correct. Executed on August 21, 2015 at San Francisco, California.

23 /s/ R. Alexander Saveri

24 R. Alexander Saveri

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28 ¹ Order Re: Preliminary Approval of Class Action Settlements with Thomson and TDA Defendants
(Mar. 26, 2015) (Dkt. No. 3810).